

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

WILLIAM T. WHITMAN, individually
and on behalf of all others similarly
situated,

Plaintiff,

vs.

STATE FARM LIFE INSURANCE
COMPANY,

Defendant.

) NO. 3:19-cv-06025-BJR

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

**PROPOSED ORDER ON
DEFENDANT'S MOTION TO SEAL
(DKT. 80)**

Upon the motion of Defendant to file under seal certain confidential documents and information, **IT IS HEREBY ORDERED THAT:**

1. The motion is **[GRANTED/DENIED]** as to the documents identified in paragraphs 1 – 16 and 23 of Defendant's motion for leave to file under seal (Dkt. 80 at pp. 1 – 3);
2. The motion is **DENIED** as to the documents identified in paragraphs 17 – 22 of Defendant's motion for leave to file under seal (Dkt. 80 at p. 3) and as to Exhibit 8 to the

1 Declaration of Cari Dawson. Redacted versions Exhibits 1, 3, 6, 7, 8, and 9 to the
2 Declaration of Cari Dawson shall be publicly available.

- 3 3. It is further ordered that the Clerk shall seal the confidential document filed at Document
4 108-10 (Exhibit 10 to the Declaration of Cari Dawson), and replace the publicly filed
5 version with the redacted version of Exhibit 10.

6 **IT IS SO ORDERED.**

7 DATED this _____ day of _____, 2021.

8
9 _____
10 Honorable Barbara J. Rothstein
11 UNITED STATES DISTRICT JUDGE

12 Presented by:

13 TOUSLEY BRAIN STEPHENS PLLC

14 By: s/ Kim D. Stephens
15 Kim D. Stephens, P.S. WSBA #11984
16 Rebecca L. Solomon, WSBA #51520
17 1700 Seventh Avenue, Suite 2200
18 Seattle, Washington 98101
19 Tel: 206.682.5600/Fax: 206.682.2992
20 Email: kstephens@tousley.com
21 rsolomon@tousley.com

22 Norman E. Siegel (*admitted pro hac vice*)
23 siegel@stuevesiegel.com
24 Lindsay Todd Perkins (*admitted pro hac vice*)
perkins@stuevesiegel.com
Ethan Lange (*admitted pro hac vice*)
lange@stuevesiegel.com
STUEVE SIEGEL HANSON LLP
460 Nichols Road, Suite 200
Kansas City, Missouri 64112
Tel: 816-714-7100
Fax: 816-714-7101

1 John J. Schirger (*admitted pro hac vice*)
2 jschirger@millerschirger.com
Matthew W. Lytle (*admitted pro hac vice*)
3 mlytle@millerschirger.com
Joseph M. Feierabend (*admitted pro hac vice*)
4 jfeierabend@millerschirger.com
MILLER SCHIRGER, LLC
5 4520 Main Street, Suite 1570
Kansas City, Missouri 64111
6 Tel: 816-561-6500
Fax: 816-561-6501

7 Stephen R. Basser (*admitted pro hac vice*)
8 sbasser@barrack.com
BARRACK, RODOS & BACINE
9 One America Plaza
600 West Broadway, Suite 900
10 San Diego, CA 92101
Tel: 619-230-0800
11 Fax: 619-230-1874

12 Joseph Gentile
joseph@sarrafgentile.com
13 Ronen Sarraf
ronen@sarrafgentile.com
14 SARRAF GENTILE LLP
14 Bond Street #212
15 Great Neck, NY 11021
Tel: 516-699-8890
16 Fax: 516-699-8968

17 ***Attorneys for Plaintiff, William T. Whitman***